

FEOERAL ELECTION COMMISSION WASHINGTON, D.C. 20168.

January 7, 2005.

Dave Syverson, Treasurer Illinois Republican Party P.O. Box 78 Springfield, IL 62705

Response Due Date: February 7, 2005

RQ-2

Identification Number: C00005926

Reference:

12 Day Pre General Report (10/01/04-10/13/04)

Dear Mr. Syverson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-The limitation on making coordinated party expenditures on behalf of a House candidate for the 2004 general election is \$37,310. Your reports, however, disclose coordinated party expenditures made on behalf of "Crane for Congress" totaling \$184,393.33, which appear to exceed the limitations under 2 U.S.C. §441a(d).

If any apparently excessive expenditure in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive coordinated party expenditure, you must notify the candidate and request a refund of the amount in excess of the limitation.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

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Although the Commission may take further legal action concerning the excessive coordinated party expenditures, prompt action in obtaining a refund will be taken into consideration.

-Schedule A supporting Line(s) 11(c) of your report discloses a receipt(s) from a candidate committee(s) (see attached) which requires further clarification. For example, if this activity represents a transfer of funds, please indicate "transfer" on Schedule A supporting Line 11(c) of your report. If this activity represents a reimbursement for services provided to this committee, please indicate this on Schedule A supporting Line 15 of your report. Please amend your report to clarify the type of activity this receipt(s) represents.

The total listed on Line 9, Column B of the Schedule L Aggregation Page for the "Levin" account appears to be incorrect. Please be advised that you should add the "Column B Year-to-Date" total from your previous report to the current "Column A Total This Period" figure to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

On Schedule H4, your allocated activity or event year-to-date total calculations for the Administrative category are incorrect. Allocated activity or event year-to-date totals for administrative, voter drive and exempt activity costs are derived by aggregating all disbursements during the calendar year for each separate category. Allocated activity or event year-to-date totals for fundraising and direct candidate support activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous event year-to-date total for that category or event. This running event year-to-date total should be disclosed after each disbursement is listed. Please amend your report by providing the correct event year-to-date totals.

-Schedule H4 supporting Line 21(a)(i) discloses \$100,000 in federal transfers to what appears to be a non-federal account of your committee. Please provide further clarification regarding this transfer to your non-federal account.

You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. If the disbursement disclosed on Schedule H4 supporting Line 21(a)(i) was made to influence the election or defeat of specific federal candidates, the disbursement

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should be allocated accordingly and disclosed as either an in-kind contribution on Schedule B supporting Line 23, independent expenditure on Schedule E supporting Line 24, or as a coordinated expenditure on Schedule F supporting Line 25. 11 CFR §§104.3(b)(3) and 106.1 In addition, if your non-federal account has paid any expenditures which should have been allocated, you are advised to correct any non-compliance with 11 CFR §§106.6 and 106.7 and establish procedures to insure future compliance with allocation regulations.

Schedule F of your report discloses coordinated expenditures made on behalf of a candidate(s). Please be advised that only national and state party committees may assign designated spending limits. However, your committee discloses that it has been designated to make such expenditures by an apparent principal campaign committee. Please amend your report with ciarifying information. 2 U.S.C. §441a(d)

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether and action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the previsions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

<u>reports</u>) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1133.

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Campaign Finance Analyst Reports Analysis Division.

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Contributor Name	Date	Amount	Rnpart
Votunteers for Shimkus	10/13/2004	\$20,000	2004 12 Day Pre General Report